



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue  
Seattle, Washington 98101

November 10, 1998

Mr. Talley Jenkins  
U.S. Department of Energy  
Idaho Operations Office  
850 Energy Drive  
Idaho Falls, Idaho 83401

Re: Comments on the Draft Remedial Investigation/Feasibility Study Scope of Work for  
Waste Area Group 3 Tank Farm, Operable Unit 3-14, at INEEL

Dear Talley:

Following are my comments on the above referenced document:

- 1) Assumption #2 contains the confusing statement, "Tank closure activities will take priority over OU 3-14 goals." Though tank closure activities will likely occur before Tank Farm soil remediation can occur, tank closure actions must be consistent with the remedial action and cleanup goals specified in the future OU 3-14 Record of Decision. Revise the above statement to reflect this concept.
- 2) Assumption #3 contains the statement that the proposed schedule includes only a single phase of field investigation and if a second phase of field investigation is necessary the schedule will be extended. Assumption #7 contains a nearly identical statement. Please combine the two into one assumption.
- 3) Assumption #6 states that if additional or more complex treatability studies are necessary, the enforceable schedule will have to be extended. Though it may be necessary to extend the schedule if additional treatability studies are more complex than the proposed schedule allows, it should be possible to conduct additional treatability studies in parallel with the *in situ* stabilization study if these studies are of comparable complexity to the stabilization study.
- 4) Assumptions #15 and #18 both contain statements that project objectives and goals can only completely be achieved if worker safety requirements can be satisfied. Combine these statements into one assumption.
- 5) Schedule and Deliverables. The proposed submittal date for the Draft Treatability Study Work Plan is about 4 month after submittal of the Draft RI/FS Work Plan. This delay may be critical in completing the treatability studies on schedule. I recommend that the Draft Treatability Study Work Plan be submitted at approximately the same time as the Draft RI/FS Work Plan.

After you and your staff have reviewed the above comments, please contact me so that we can discuss and resolved them.

Sincerely,



Keith A. Rose  
INEEL WAG Manager

cc: Scott Reno, IDEQ

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DEQ-FFA/CO

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